

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A BRAZOS  
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

JUNIPER NETWORKS, INC.

Defendant.

Civil Action No.: 6:20-cv-00812-ADA  
6:20-cv-00813-ADA  
6:20-cv-00814-ADA  
6:20-cv-00815-ADA  
6:20-cv-00902-ADA  
6:20-cv-00903-ADA

**JURY TRIAL DEMANDED**

**DECLARATION OF TODD M. BRIGGS IN SUPPORT OF JUNIPER NETWORKS,  
INC.'S OPPOSED MOTION TO MODIFY PROTECTIVE ORDER**

I, Todd M. Briggs, declare and state as follows:

1. I am a partner at Quinn Emanuel Urquhart & Sullivan LLP, counsel for Defendant Juniper Networks, Inc. (“Juniper”). I have personal knowledge of the matters stated herein and, if called as a witness, could and would testify competently to such facts under oath.

2. Attached hereto as Exhibit A is a clean version of Juniper’s proposed modified protective order.

3. Attached hereto as Exhibit B is a redlined version of the proposed protective order.

4. Attached hereto as Exhibit C is a true and correct copy of WSOU’s request to inspect Juniper’s source code, sent on June 4, 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: June 7, 2021

*/s/ Todd M. Briggs*

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Todd M. Briggs